

Exhibit B

From: [Gary I. Smith, Jr.](#)
To: [Abbott, Christopher](#)
Subject: RE: Broiler Growers Fred Heatherly Deposition
Date: Tuesday, October 19, 2021 10:52:52 AM
Attachments: [image001.png](#)
[image368657.png](#)

Further to the below, Mr. Heatherly has requested November 1, and Plaintiffs can make that work.



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From: Gary I. Smith, Jr. <GSmith@hausfeld.com>
Sent: Tuesday, October 19, 2021 9:37 AM
To: Abbott, Christopher <Christopher.Abbott@weil.com>
Subject: Broiler Growers Fred Heatherly Deposition

Chris,

Mr. Heatherly is ready to move forward with his deposition. He's about to undergo treatment for a major health condition. He has asked if his deposition can be "remote," but with his lawyer (and only his lawyer) present. Although that is not permitted by the deposition protocol, I am amenable to it because of his health issues.

Let me know if defendants have any objection to this. Once I get confirmation that you're fine with it, I'll work on a date.

Thanks and hope all is well,

Gary

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